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Attorneys for Mr. Rodriguez-Acosta

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE IRMA E. GONZALEZ)

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL RODRIGUEZ-ACOSTA,

Defendant.

Case No.: 08CR0878-IEG

Date: April 28, 2008

Time: 2:00 p.m.

**NOTICE OF MOTIONS AND
MOTIONS TO:**

- (1) **COMPEL DISCOVERY;**
- (2) **PRESERVE AND INSPECT EVIDENCE;**
- (3) **GRANT LEAVE TO FILE FURTHER
MOTIONS**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
PETER MAZZA, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that, on April 28, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, the accused, Miguel Rodriguez-Acosta, by and through his attorneys, Victor Pippins and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions outlined below.

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MOTIONS

Defendant, Mr. Rodriguez-Acosta, by and through his attorneys, Victor Pippins and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- (1) Compel Discovery; and
- (4) Preserve and Inspect Evidence; and
- (5) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at or before the time of the hearing on these motions.

Respectfully submitted,

DATED: April 18, 2008

/s/ Victor N. Pippins
VICTOR N. PIPPINS
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Rodriguez-Acosta
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Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(**HONORABLE IRMA E. GONZALEZ**)

UNITED STATES OF AMERICA,)	Case No.: 08CR0878-IEG
)	
Plaintiff,)	
)	
v.)	
)	
MIGUEL RODRIGUEZ-ACOSTA,)	CERTIFICATE OF SERVICE
)	
)	
Defendant.)	
)	

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his information and belief, and that a copy of the foregoing document has been served this day upon:

Peter J Mazza
peter.mazza@usdoj.gov, lilian.ruiz@usdoj.gov, efile.dkt.gc1@usdoj.gov

Respectfully submitted,

DATED: April 18, 2008

/s/ Victor N. Pippins

VICTOR N. PIPPINS
Federal Defenders of San Diego, Inc.
Attorneys for Defendant